REMARKS

Reconsideration of this application is respectfully requested. An RCE accompanies this Amendment.

Claims 1, 4-9, and 12-22 are pending. Claims 1, 4-9, and 12-22 stand rejected. No claims have been added, amended or cancelled.

Rejections Under 35 U.S.C. §102(e)

Claims 1, 4, 7-9, 12, 15-18, 21, and 22 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,937,598 of Hagirahim, et al. ("Hagirahim").

In independent claims 1, 9 and 17, applicants claim "an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format."

Hagirahim discloses transporting ATM-based traffic via an IP-based backbone network. (Hagirahim, col. 1, lines 66-67). The Examiner refers to Hagirahim's col. 5, lines 29-49 and line 59 to col. 6, line 38 as teaching the claimed limitation. In the relevant portions of the cited text, Hagirahim reads as follows:

> Once the call has been established, the gateways 21 will transmit IP packets 51, which include encapsulated ATM cells 41. ATM formatted cells of 53 bytes are completely enclosed within Transmission Control Protocol (TCP/IP) headers or User Datagram Protocol (UDP/IP) headers for transmission over the IP backbone 11. The IP header includes the translated ATM address received from the controller by the source gateway so that the packet is properly addressed with the IP address corresponding to the destination ATM address. Upon receiving an IP packet containing an ATM cell, the destination gateway will extract the ATM cell by means of decapsulating the IP header and transmitting the newly extracted ATM cell to the appropriate endpoint through the ATM network 61 serving the addressed party.... The gateway 21, without terminating the ATM protocol, can use the IP backbone network to transfer the ATM cells encapsulated in IP headers according to the methodology of the invention.... The destination gateway 21, upon receiving an IP bearer packet from the IP backbone, will extract the ATM cell from the packet by decapsulating the header and transfer the enclosed ATM cell to its endpoint via a DSLAM 101 at the destination end.

(Hagirahim, col. 5, lines 35-49; col. 6, lines 10-13, lines 33-38) (emphasis added). Thus, Hagirahim discloses forming an IP packet that includes an ATM cell and an IP header and

subsequently extracting the ATM cell from the IP packet. Hagirahim is silent about and does not teach or suggest that the voice data in the ATM format is converted to voice data in the IP format. Rather, Hagirahim explicitly discloses that the IP packet keeps the **ATM cells intact** within the packet. (Hagirahim, Abstract). Thus, Hagirahim only discloses packaging an ATM cell with an IP header to form an IP packet. Hagirahim does not teach or suggest directly converting the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed.

As such, Hagirahim does not anticipate claims 1, 9 and 17, and associated dependent claims 4, 7-8, 12, 15-16, 18, 21, and 22.

Rejections Under 35 U.S.C. §103(a)

Claims 5, 6, 13, 14, 19, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "Hagirahim" and U.S. Patent No. 6,041,054 of Westberg.

As discussed, Hagirahim does not teach or suggest an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed. Applicants respectfully submit that Westberg does not supply the missing limitations. Westberg discloses employing ATM adaption layer two (AAL2) minicells as a bearer. (Westberg, Abstract). Westberg also is silent about and does not teach or suggest an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed.
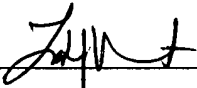
As neither Hagirahim nor Westberg teaches each and every limitation of independent claims 1, 9 and 17, applicants respectfully submit that associated dependent claims 5, 6, 13, 14, 19, and 20 are not rendered by the combination.

It is respectfully submitted that in view of the arguments set forth herein, the applicable rejections and objections have been overcome. If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Lester J. Vincent
Reg. No. 31,460

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(408) 720-8300